

# EXHIBIT K

**Supplemental Responses – Joint Advisory**

**Defendant Dr. Guerra's Second Request for Production for Plaintiff Dr. Rodrigo Cantu**

See below Plaintiff Dr. Rodrigo Cantu's supplemental responses to Dr. Guerra's Second Request for Production of Documents #35-72:

- 35-57. Defendant Dr. Guerra's Third Request for Production Nos. 31-57 request receipts and documentation to support compensatory, consequential, and punitive damage claims brought by Plaintiffs. Plaintiffs refer defense counsel to the Supplemental Responses to Plaintiffs' First Set of Interrogatories submitted together with this response. Plaintiffs' counsel has outlined responsive discovery to each of the requests made in Nos. 35-57 with Bates numbers identifying each expense incurred by Plaintiffs as a direct result of Defendants' unlawful conduct.
58. All receipts, invoices, and documents evidencing the costs and damages identified in Section 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** All documents have been submitted.

59. All medical records pertaining to the treatment you received from Dr. John Seals which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** Although Rodrigo Cantu received treatment from Dr. John Seals, there are no medical records available, and they are not attainable.

60. All billing records pertaining to the treatment you received from Dr. John Seals which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** Although Rodrigo Cantu received treatment from Dr. John Seals, there are no billing records available, and they are not attainable.

61. All medical records pertaining to the treatment you received from Steve Cervantes which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** HIPPA forms for request for records have been signed and submitted to Defendant Dr. Guerra.

62. All billing records pertaining to the treatment you received from Steve Cervantes which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** HIPPA forms for request for records have been signed and submitted to Defendant Dr. Guerra; PlaintiffsSuppDisc#00184-85.

63. All medical records pertaining to the treatment you received from Randolph A. Pollock, MA, LPC which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** Plaintiff Dr. Rodrigo Cantu did not receive treatment from Randolph Pollock

64. All billing records pertaining to the treatment you received from Randolph A. Pollock, MA, LPC which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** Plaintiff Dr. Rodrigo Cantu did not receive treatment from Randolph Pollock.

65. All medical records pertaining to the treatment you received from Dr. Joann Murphy which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** Plaintiff Dr. Rodrigo Cantu did not receive treatment from Joann Murphy.

66. All medical records pertaining to the treatment you received from Deena Trevino which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** HIPPA forms for request for records have been signed and submitted to Defendant Dr. Guerra.

67. All medical records pertaining to the treatment you received from Christine Hefel which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** Plaintiff Dr. Rodrigo Cantu did not receive treatment from Christine Hefel.

68. All billing records pertaining to the treatment you received from Christine Hefel which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** Plaintiff Dr. Rodrigo Cantu did not receive treatment from Christine Hefel.

69. All billing records pertaining to the treatment you received from Deena Trevino which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** HIPPA forms for request for records have been signed and submitted to Defendant Dr. Guerra.

70. All billing records pertaining to the treatment you received from Dr. Joann Murphy which is referenced in Section 1 and 3 of Plaintiffs' Initial Required Disclosures served on December 1, 2020.

**Supplemental Response:** Plaintiff Dr. Rodrigo Cantu did not receive treatment from Joann Murphy.

71. All receipts, invoices, and documents evidencing your claim in Section 3 of Plaintiffs' Initial Required Disclosures that you incurred approximately \$50,000 in fees, taxes, and penalties for withdrawing the money from your and/or Melody Joy Cantu's retirement funds in order to pay Plaintiffs' attorneys' fees as a result of Defendants' conduct.

**Supplemental Response:** MCantuFinalProd# 001245-001246; 001081-001082.

72. Copies of all the photographs and emails referenced in Melody Joy Cantu's deposition testimony below that she testified you and/or Melody Joy Cantu saved:

**Supplemental Response:** MCantuFinalProd# 001112.